

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Charles P. Jones,  
Plaintiff

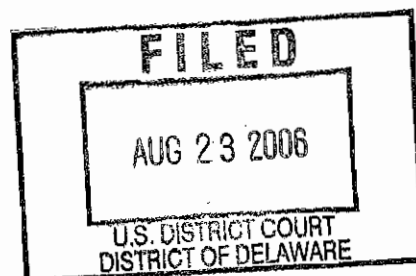
v.

Thomas Corbally, Alisa Prokaj,  
Peter Forbes, and Joe Parnella  
Defendants

Civil Action No.  
06-129-XAJ

Request Response For Motion For Appointment Of Counsel

1. Plaintiff filed a motion for appointment of Counsel pursuant to 28 U.S.C. 1915(d)(1).
2. Plaintiff motion was filed July 27, 2006 and is requesting an order.
3. There will be need to access records and conduct investigations not possible by plaintiff.
4. There is likelihood of substantial prejudice to plaintiff resulting from his inability without such assistance to present the facts and legal issues to the court in this complex, and arguably meritorious case.
5. Expert testimony will be needed.
6. Counsel is needed in order to properly prepare motions to amend.
7. There is credibility (whether or not a witness is telling the truth) which is most important and Counsel will be needed to cross-examine.



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8. Due to this case involving medical issues, there are serious complex legal issues, which will not be properly presented minus appointment of Counsel.

Plaintiff also uses the same claims in support of this request stated previously in original motion for Counsel filed on July 27, 2006.

Wherefore, Plaintiff respectfully request and pray that Your Honor please appoint Counsel in this case.

August 21, 2006  
Date

Respectfully Submitted,  
Charles D. Jones  
Charles D. Jones  
#00228187  
Dewake Cork Center  
Smymna Delaware  
19977

**Certificate of Service**

I, Charles P. Jones, hereby certify that I have served a true

And correct cop(ies) of the attached: REQUEST RESPONSE FOR MOTION  
FOR APPOINTMENT OF COUNSEL upon the following  
parties/person (s):

TO: Opheia Waters  
Deputy Attorney General  
820 N. French Street  
Wilmington, DE.  
19801

TO: \_\_\_\_\_  
\_\_\_\_\_  
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TO: \_\_\_\_\_  
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TO: \_\_\_\_\_  
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BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 21 day of August, 2006

I/M Charles P. Jones

SBI# 228197 UNIT T-2

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON DE 197

22 AUG 2006 PM 3 T

Clerk of the Court  
United States District Court  
J. Caleb Boggs Federal Building

844 N. King Street *Lock Box 18*

Wilmington, Delaware

19801

